

EXHIBIT A

From: Saul Bienenfeld <saul@bienenfeldlaw.com>
Sent: Thursday, July 31, 2025 4:57 PM
To: Sandlar, Leonid (CRM)
Cc: Judge Barry Kamins
Subject: [EXTERNAL] Egbert Simon. USA vs Walden
Attachments: 01-08-25 USA v. Robinson (NRM) - REDACTED - final.pdf

Hi AUSA Sandler

I would like to have Egbert Simon testify at the hearing as an expert in CPB protocol for border searches. Mr. Simon currently works at the EDNY US Attorneys Office as a Special Agent. Prior to working at the US Attorneys Office he worked 16 years as a CBP officer.

If you would produce him voluntarily - that would be amazing. If you will not produce him please let me know at your earliest convenience so that I can subpoena him. He would be testifying consistent with his testimony in USA vs Robinson (I have attached the transcript).

Alternatively, I would be amenable to having his testimony (direct and cross) read into the Walden transcript at the evidentiary hearing and allow Judge Brown to take judicial notice as to the CBP protocols prior to seizing a cell phone.

Thanks. I look forward to your reply.

Saul Bienenfeld